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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

**ZELPRO ASSEMBLY SOLUTIONS, LLC
an Oregon limited liability company AND
CALVIN RASMUSSEN, an individual,**

Plaintiffs,

v.

**STINGL PRODUCTS, LLC, a Virginia
limited liability company, DAVID STINGL,
an individual, and TONY SIRIANNI, an
individual,**

Defendants.

Civil Action No. CV 11-519 ST

**MEMORANDUM TO PLAINTIFF'S
UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE A
RESPONSE TO MOTION FOR
SUMMARY JUDGMENT**

Plaintiffs Zelpro Assembly Solutions, LLC and Calvin Rasmussen move pursuant to Local Rule 16.3 for an order extending the time to file a response to Defendant David Stingl and Tony Sirianni's Motion for Summary Judgment.

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**Page 1 – MEMORANDUM TO PLAINTIFF'S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO AMEND THE COMPLAINT**

POINTS AND AUTHORITIES

LR 16.3 provides, in relevant part, the following:

Objections to any court-imposed deadline must be raised by motion and must:

- (1) Show good cause why the deadlines should be modified.
- (2) Show effective prior use of time.
- (3) Recommend a new date for the deadline in question.
- (4) Show the impact of the proposed extension upon other existing deadlines, settings, or schedules.

A. There is good cause why the deadline should be modified.

The lead counsel for Plaintiffs was out of town for two weeks as of the day the motion for summary judgment was filed. Plaintiffs need more time to prepare an adequate response to the motion.

B. There has been an effective prior use of time.

Counsel for Plaintiffs have been working diligently on the motion given the time that they have had available.

C. Recommended new dates.

Plaintiffs request an extension of the deadline to November 12, 2013.

D. The impact of an extension upon other existing deadlines will be *de minimus*.

No other deadlines will be affected by the requested extension.

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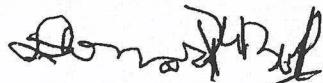
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CONCLUSION

Based on the above, Plaintiff respectfully requests that the Court grant an extension of the deadline November 12, 2013.

DATED: October 25, 2013.

Respectfully submitted,



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